

## UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**OMNIBUS SEALING STIPULATION  
REGARDING DKT. NO. 1778**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively, "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with the Parties' Joint Letter Brief re YouTube 30(b)(6) Dispute (ECF No. 1778).

At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the following chart.

1     **I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR**  
 2     **PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
1778-2	Exhibit A to Joint Letter Brief re YouTube 30(b)(6) Dispute	Maintain redactions at 5, 7, 8, 12.	Good cause exists to seal sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Matthew Donohue ("Donohue Decl.") at 2.	A party has not previously sought to seal the same information.
1778-5	Exhibit C to Joint Letter Brief re YouTube 30(b)(6) Dispute	Maintain redactions at 1.	The redactions contain the names of employees who are not parties to this action. Disclosure of YouTube employees' identities violates their privacy interests and could cause them to receive threatening contact from the public. Indeed, YouTube employees have previously been identified, doxxed, harassed, and threatened due to their mere connection to	A party has not previously sought to seal the same information.

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
			<p>YouTube's public filings in litigation. Donohue Decl. at 2.</p> <p>The Court has previously sealed information related to the identities of third-party employees. <i>E.g.</i>, ECF Nos. 914, 1659.</p>	
1778-7	Exhibit D to Joint Letter Brief re YouTube 30(b)(6) Dispute	Maintain redactions at 5, 7.	<p>Good cause exists to seal sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Donohue Decl. at 2.</p>	A party has not previously sought to seal the same information.
1778-9	Exhibit E to Joint Letter Brief re YouTube 30(b)(6) Dispute	Maintain redactions at 5.	<p>Good cause exists to seal sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and</p>	A party has not previously sought to seal the same information.

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
			thereby cause competitive harm to YouTube. <i>See</i> Donohue Decl. at 3.	

**IT IS SO STIPULATED AND AGREED.**

Respectfully submitted,

DATED: April 1, 2025

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By: /s/ Matthew K. Donohue

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## ATTESTATION

I, Matthew K. Donohue, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 1, 2025

By: s/ Matthew K. Donohue  
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